

EXHIBIT 55

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,)	
)	
Plaintiff,)	
)	
vs.)	No. 20-cv-00983
)	
CITY OF SEATTLE,)	
)	
Defendant.)	

VIDEOTAPED VIDEOCONFERENCE 30(B)(6) AND INDIVIDUAL
DEPOSITION UPON ORAL EXAMINATION OF
CITY OF SEATTLE
(HAROLD SCOGGINS)

***PORTIONS OF THIS TESTIMONY ARE DESIGNATED
CONFIDENTIAL AND ARE SEALED
UNDER A SEPARATE COVER.***

Seattle, Washington
(All participants appeared via videoconference.)

DATE TAKEN: SEPTEMBER 14, 2021

REPORTED BY: CINDY M. KOCH, RPR, CRR, CCR #2357

1 A. No.

2 Q. Did there become a time around June 7th or
3 June 8, 2020, that the fire department and the police
4 department were concerned that there might be a fire set
5 to the building that houses the east precinct?

6 A. There was.

7 Q. And what was the source of that information?

8 A. I believe it was the FBI.

9 Q. Did you talk to the FBI, yourself, about --
10 about that issue?

11 A. I did.

12 Q. Okay. Can you describe your conversation or
13 conversations with them about that issue?

14 A. Sure. Vaguely, he expressed that there was
15 a -- a credible threat to burn the building, and that's
16 what we talked about.

17 Q. Was that on June 8, 2020? Do you recall?

18 A. I'm not sure if it was on June 8th, but if it
19 wasn't, it was leading up to. I'm not sure of the exact
20 date and time.

21 Q. So what steps did the -- did the fire
22 department take with that information to protect or try
23 to protect the east precinct?

24 A. Well, when you say try to protect the east
25 precinct, I'm not sure what that means.

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1 things we were trying to accomplish was if we were going
2 to open up these lanes for vehicle traffic, we needed to
3 create, lack of a better term, a barrier between the
4 vehicles and where people were going to be. So that was
5 a part of the mindset, and when we shifted the landscape
6 and how we shifted it.

7 Q. Okay. But at some point after several days
8 that -- that all changed again because the protesters
9 moved some barriers and blocked things that had
10 previously been open; is that correct?

11 A. That is correct. It was dynamic. I don't know
12 exactly how many days. But I know it was an ongoing
13 work in progress.

14 Q. Okay. I'd like to go back to Exhibit 19. It's
15 the first text in that chain. And it's a text from you
16 that is simply a YouTube link. And I can tell you that
17 there's -- there's no text before or after it indicating
18 why you were sending this link.

19 This was sent on, it looks like, 2:00 on
20 June 15, 2020. The link goes to -- and you might be
21 able to hit the hyperlink there and see what I'm talking
22 about. The link goes to footage of what had happened at
23 Car Tender on the night of the 14th.

24 A. Do you want me to hit the link?

25 Q. You can hit the link if you want, just to see

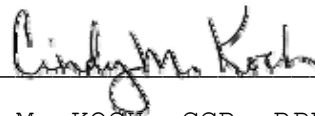
C E R T I F I C A T E

STATE OF WASHINGTON

COUNTY OF PIERCE

I, Cindy M. Koch, a Certified Court Reporter in
and for the State of Washington, do hereby certify that
the foregoing transcript of the deposition of Harold
Scoggins, having been duly sworn, on September 14, 2021,
is true and accurate to the best of my knowledge, skill
and ability.

IN WITNESS WHEREOF, I have hereunto set my hand
and seal this 23rd day of September, 2021.



CINDY M. KOCH, CCR, RPR, CRR



My commission expires:

JUNE 9, 2022




DECLARATION

CASE NAME: Hunters Capital, LLC v. City of Seattle

DATE TAKEN: 9/14/2021

WITNESS: 30(b)(6) and Individual Deposition of Harold Scoggins with Confidential Excerpt

I declare under penalty of perjury under the laws of the State of Washington that I have read my within deposition, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the ERRATA flyleaf page hereof.



30(b)(6) and Individual Deposition of
Harold Scoggins with Confidential Excerpt

Signed on the 22 day of October, 2021.



ERRATA

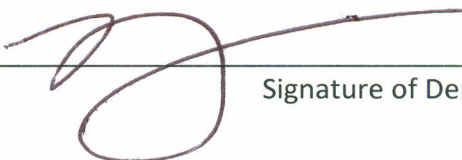
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CORRECTIONS

Page	Line	Now Reads	Should Read
		<i>I have reviewed the entire document and focused on my answers. They all seem correct, but it was hard to determine my exact answers vs. the words on the paper without having the audio to playback. I think the intent and context is correct.</i>	
_____	_____	_____	_____
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Signature of Deponent